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Counsel to the Debtors and Debtors in Possession

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11

Gawker Media LLC, et al., Case No. 16-11700 (SMB)

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Debtors. : (Jointly Administered)

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NOTICE OF FILING OF REVISED PLAN SUPPLEMENT DOCUMENT PURSUANT TO THE DEBTORS' AMENDED JOINT CHAPTER 11 PLAN OF LIQUIDATION FOR GAWKER MEDIA GROUP, INC., GAWKER MEDIA LLC, AND GAWKER HUNGARY KFT.

PLEASE TAKE NOTICE that on November 8, 2016, the Debtors filed the Notice of Filing of Solicitation Version of the Disclosure Statement for the Debtors' Amended Joint Chapter 11 Plan of Liquidation for Gawker Media Group, Inc., Gawker Media LLC, and Gawker Hungary Kft. (the "Solicitation Version of the Amended Disclosure Statement"), which included as Exhibit A thereto the Amended Debtors' Joint Chapter 11 Plan of Liquidation for

¹ The last four digits of the taxpayer identification number of the debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Gawker Hungary Kft. (f/k/a Kinja Kft.) (5056). Gawker Media LLC and Gawker Media Group, Inc.'s mailing addresses are c/o Opportune LLP, Attn: William D. Holden, Chief Restructuring Officer, 10 East 53rd Street, 33rd Floor, New York, NY 10022. Gawker Hungary Kft.'s mailing address is c/o Opportune LLP, Attn: William D. Holden, 10 East 53rd Street, 33rd Floor, New York, NY 10022.

Gawker Media Group, Inc., Gawker Media LLC, and Gawker Hungary Kft. (the "Amended Plan").

PLEASE TAKE FURTHER NOTICE that on November 30, 2016, the Debtors filed the Notice of Filing of Plan Supplement Pursuant to the Debtors' Amended Joint Chapter 11 Plan of Liquidation for Gawker Media Group, Inc., Gawker Media LLC, and Gawker Hungary Kft. (the "Plan Supplement") [Docket No. 516].

PLEASE TAKE FURTHER NOTICE that the Plan Supplement included a Settlement Agreement with Terry Gene Bollea (the "Bollea Settlement Agreement"), attached as Exhibit C.

PLEASE TAKE FURTHER NOTICE that the Debtors hereby file the following revised Plan Supplement document:

• Exhibit C Executed Settlement Agreement with Terry Gene Bollea

PLEASE TAKE FURTHER NOTICE that attached hereto as <u>Exhibit 1</u> is a redline of the original version of the Bollea Settlement agreement as previously attached to the Plan Supplement marked against the version of such document that is attached hereto, which fully executed version incorporates technical modifications.

PLEASE TAKE FURTHER NOTICE that the Debtors reserve the right, subject to the terms and conditions set forth in the Amended Plan, to alter, amend, modify, or supplement any document in the Plan Supplement; provided, if any document in the Plan Supplement is altered, amended, modified, or supplemented in any material respect prior to the hearing to confirm the Amended Plan, the Debtors will file a redline of such document with the Bankruptcy Court.

PLEASE TAKE FURTHER NOTICE that a hearing to consider confirmation of the Amended Joint Chapter 11 Plan is scheduled for December 13, 2016 at 10:00 a.m. (prevailing Eastern Time) before the Honorable Stuart M. Bernstein at the United States Bankruptcy Court

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for the Southern District of New York, One Bowling Green, Courtroom 723, New York, New York 10004 (the "Confirmation Hearing").

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PLEASE TAKE FURTHER NOTICE that the Confirmation Hearing may be continued from time to time by the Court or the Debtors without further notice other than by such adjournment being announced in open court or by a notice of adjournment being filed with the Court and served on parties entitled to notice under Bankruptcy Rule 2002 and the local rules of the Court or otherwise.

Dated: December 12, 2016 New York, New York /s/ Gregg M. Galardi
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